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June 19, 1999

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852.

Re: Docket #98N-1038, "Irradiation in the production, processing and handling of food".

To Whom It May Concern:

The FDA's original reason for labeling irradiated food is still valid--that irradiation is a process that can change the texture, taste, storage characteristics and nutrients of a food and should therefore be disclosed to avoid misleading the consumer.

Thus, the absence of a statement would be misleading because irradiation destroys vitamins and causes changes in sensory and spoilage qualities that are not obvious or expected by the consumer.

Therefore, we want you to require labeling of irradiated foods, using the terms "irradiation" or "irradiated" and the use of the radura symbol, and that the labeling to be prominent, so that consumers can easily tell what they are getting.

The proposed alternative terms such as "cold pasteurization" and "electronic pasteurization" are misleading, and therefore should not be used.

Sincerely,



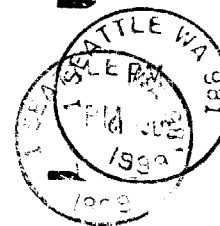
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